

REMARKS

The Final Rejection dated February 14, 2005, has been carefully considered. In response thereto, the application as it stands is considered to be in condition for allowance. Accordingly, reconsideration and withdrawal of the outstanding Final Rejection and issuance of a Notice of Allowance are respectfully solicited.

At the outset, the Applicants acknowledge with appreciation the indication of allowable subject matter in claims 26, 34 and 42.

The Applicants respectfully traverse the rejection of claims 1-18 under 35 U.S.C. § 102(e) over *Krishnamurthy et al* '831.

The applied reference is silent on any reasons for body-biasing the keeper. Instead, the reference focuses on forward body-biasing the pull-down network transistors to enhance evaluation speed or reverse body-biasing them to reduce leakage. For example, in column 7, lines 13-17, the analysis set forth in the reference is valid for the pull-down transistors, but not valid with regard to a body-biased keeper transistor.

By contrast, the present invention has a goal of enhancing noise immunity by body-biasing the keeper. The applied reference is silent on that subject. That distinction is brought out further in newly added claims 50 and 51, which recite techniques not taught or suggested by the applied reference.

On page 5, paragraph 5, the Final Rejection includes a response to the previously filed Amendment. The Applicants respectfully disagree with the reasoning set forth in that paragraph and submit that the additional arguments in that paragraph do not show that the present claimed invention is anticipated.

The applied reference is concerned primarily with MOSFETs. To increase the V_t of a MOSFET, the MOSFET must be reverse body biased. When a keeper

transistor in the device of the applied reference is reverse body biased, the noise immunity is degraded. Therefore, the applied reference cannot possibly be talking about reverse body biasing the keeper. Contrary to the argument made in the Final Rejection, neither the applied reference nor any other reference teaches “body biasing the keeper to reduce leakage and increase noise immunity,” since increasing noise immunity and reducing leakage are mutually exclusive. Any technique that reduces the leakage by body biasing the keeper degrades noise immunity. Alternatively, any technique that body biases the keeper to increase noise immunity also increases the leakage. Accordingly, what is described in the Final Rejection is impossible.

For the reasons set forth above, the Applicants respectfully submit that the application is in condition for allowance. Notice of such allowance is earnestly solicited.

If any issues remain that can be overcome most easily through a telephone communication, the Examiner is invited to telephone the undersigned attorney at the telephone number set forth below.

Please charge any deficiency in fees, or credit any overpayment thereof, to BLANK ROME LLP, Deposit Account No. 23-2185 (000687-00302). If a separate petition for extension of time does not accompany this Amendment or is insufficient to render this Amendment timely, the Applicants respectfully petition under 37 C.F.R. § 1.136(a) for an extension of time for as many months as are required to render this Amendment timely. Any fee due is authorized above.

~~Respectfully submitted,~~

By: 

David J. Edmondson
Registration No. 35,126

BLANK ROME LLP
Watergate 600, 11th Floor
600 New Hampshire Ave., N.W.
Washington, D.C. 20037-2485
(202) 772-5800 (Phone)
(202) 572-8398 (Facsimile)